



**Kalustyan Corporation since 1948**  
855 RAHWAY AVENUE, UNION, NEW JERSEY 07083  
TEL. (908) 688-6111 • FAX (908) 688-4415

E-mail: [spices@kalustyan.com](mailto:spices@kalustyan.com)

5591 55 JUL 12 P4:15

July 7, 1999

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

Dear Sir/Madam:

These comments are on behalf of Kalustyan Corporation, a company that manufactures seasonings for the food industry. We are responding to the Advance Notice of proposed Rulemaking that appeared in the Federal Register February 17, 1999, 21 CFR Part 179 (Docket No. 98N-1038) "Irradiation in the Production, Processing, and Handling of Food".

The comments respond to specific questions on page 7836 of the Federal Register that ask about: the perceived meaning by consumers of the label statements on irradiated foods; whether or not current labeling discourages the use of irradiation; should ingredients in a manufactured food be labeled; and whether or not label requirements should expire at a specific date.

We believe that the current labeling is misleading and may result in confusion for consumers. The terms "irradiation" and "radiation" are perceived as a warning rather than a statement relating to the safety of foods, and we believe these terms have a direct negative effect on public acceptance of irradiated foods. If labeling is required, the "Radura Symbol" should be used along with a qualified term such as "pasteurized by irradiation to control microorganisms, E. coli, etc."

The labeling of minor ingredients used in a manufactured food would serve no purpose and would mislead the consumer. The regulation is sufficient as it stands. To insist on labeling ingredients would limit the use of irradiation processing by our company and other industrial manufacturers. We are trying to provide a safe food supply for the public, and we believe that the terms

**98N 1038**

**C3363**

"radiation" and "irradiation" cause confusion and may lead consumers to reject some irradiated foods.

Irradiated ingredients contribute to the cleanliness of the finished food but cannot guarantee cleanliness to the same degree as if the finished food was irradiated. Therefore, there is potential for misleading the public with an irradiation label on a food that only contains an irradiated ingredient.

If labeling continues to be required, it should have a phase-out date after which the use of labeling should be voluntary.

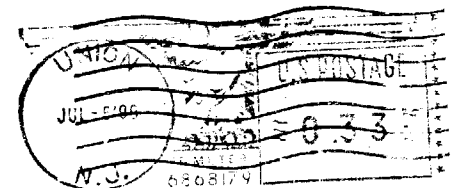
In conclusion, we believe that the perception and fears of the public could lead to the loss of an important tool in the fight for food safety. If labeling is required on irradiated foods, it must be so worded to alleviate not increase public fears.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to be 'Errol Karakash', written over the printed name.

Errol Karakash  
C.E.O.

**Kalustyan's**  
855 Rahway Avenue  
Union, New Jersey 07083



Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

20857+0001

